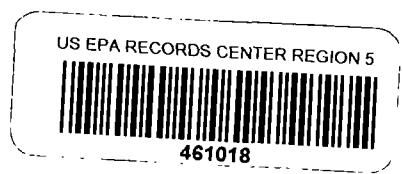


FILED
COURT OF COMMON PLEAS

80 JUN 11 A 9:31

LORAIN COUNTY
NATALIE B. NEESON, CLERK



IN THE COURT OF COMMON PLEAS

LORAIN COUNTY, OHIO

CHEMICAL RECOVERY SYSTEMS, INC.	:	CASE NO.. 86072-80
142 Locust Street	:	
P.O. Box 375	:	JUDGE PAUL J. MIKUS
Elyria, OH 44035,	:	
	:	
Plaintiff,	:	
	:	
-vs-	:	
	:	<u>MOTION TO JOIN</u>
ELYRIA CITY DEPARTMENT OF HEALTH	:	<u>NEW PARTIES DEFENDANT</u>
202 Chestnut Street	:	
Elyria, OH 44035,	:	
	:	
CITY OF ELYRIA	:	
c/o MICHAEL B. KEYS, MAYOR	:	
City Hall	:	
Broad Street	:	
Elyria, OH 44035,	:	
	:	
WILLIAM J. BROWN, ATTORNEY GENERAL,	:	
STATE OF OHIO	:	
State Office Tower	:	
30 East Broad Street	:	
Columbus, OH 43215,	:	
	:	
Defendants.	:	

Now comes the Plaintiff, by and through its attorney,
and respectfully requests this Honorable Court for an order joining
the City of Elyria, Ohio, and William J. Brown, Attorney General,
State of Ohio, as new parties defendant in the within cause of
action by reason of the requirements set forth in Ohio Revised

Code Section 2721.12. Plaintiff further requests that said new parties defendant be served pursuant to Rules 4 through 4.6 of the Ohio Rules of Civil Procedure and that they be permitted to set up any interest they may have in the within cause of action by way of answer and that they be permitted to be heard in Court through counsel.

DAVID C. LONG CO., L.P.A.

BY:

DAVID C. LONG
Attorney for Plaintiff
300 Fourth Street
P.O. Box 427
Elyria, OH 44036
Tel. (216) 323-3331

TO THE CLERK:

Please serve a copy of the foregoing Motion upon new party defendants, City of Elyria, Ohio, and William J. Brown, Attorney General, State of Ohio, and original party defendant, Elyria City Department of Health, by certified mail at the addresses set forth in the caption of this Motion.

DAVID C. LONG
Attorney for Plaintiff

CERTIFICATION

DAVID C. LONG, Attorney for Plaintiff in the within cause of action, hereby certifies that he prepared a complete copy of the original Complaint herein, the Exhibit and Affidavits attached

thereto and the long form Journal Entry granting a temporary restraining order as well as the subsequent short form Journal Entry withdrawing said temporary restraining order, and attached said copy to the copies of the foregoing Motion filed with the Court for service upon new parties defendant, City of Elyria and William J. Brown, Attorney General, State of Ohio.

DAVID C. LONG
Attorney for Plaintiff.

SUMMONS

Rec 6/5/80
6-4-80
6-4-80

CHEMICAL RECOVERY SYSTEMS, INC.

Plaintiff

v.

ELYRIA CITY DEPARTMENT OF HEALTH

Defendant

COURT OF COMMON PLEAS

LORAIN COUNTY, OHIO

No. 86072 - 80

To the following named defendants:

Elyria City Department of Health
Name

202 Chestnut Street, Elyria, Ohio
Address

Resisting Order Entered.
Natalie B. Neeson, Clerk

You have been named defendant(s) in a complaint filed in Lorain County Court of Common Pleas, Lorain County Courthouse, Elyria, Ohio by

Chemical Recovery Systems, Inc.
Name

142 Locust St., P.O. Box 375, Elyria, Ohio
Address

with Motions attached and Journal Entry
plaintiff(s). A copy of the complaint is attached hereto. The name and address of the plaintiff's attorney is David C. Long, 300 Fourth St., P.O. Box 427, Elyria, Ohio 44036

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he has no attorney of record, a copy of an answer to the complaint within twenty-eight days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three days after the service of a copy of the answer on the plaintiff's attorney.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

Natalie B. Neeson

Clerk, Court of Common Pleas
LORAIN COUNTY, OHIO

Date: 6/4/80

By

Sally M. Pack
Deputy